

San Juan Water Commission

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FAX TRANSMISSION COVER SHEET

Date: Friday, February 28, 2003 (3:40PM)
To: Stephanie Stringer
Subject: Comments on NMED's Proposal re Statewide Water Quality Management Plan
Sender: Jacqueline Allcorn

*YOU SHOULD RECEIVE PAGE 3 (S), INCLUDING THIS COVER SHEET. IF YOU DO
NOT RECEIVE ALL THE PAGES, PLEASE CALL 505-564-8969.*

Ms. Stringer,

Please find the attached comments from the San Juan Water Commission.

Please call me at (505) 564-8969 if you have any questions.

Thank you,

Jacqueline Allcorn

San Juan Water Commission

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MEMBERS:
City of Aztec
City of Bloomfield
City of Farmington
San Juan County
S.J. County Rural Water Users Assoc.

February 28, 2003

Stephanie Stringer
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

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MAR 03 2003

SURFACE WATER
QUALITY BUREAU

Re: Comments of San Juan Water Commission on Draft Revisions to Statewide Water Quality Management Plan, Introduction and Work Element 11

Dear Ms. Stringer:

Pursuant to the public notice of a 45-day comment period for proposed revisions to both the "Introduction" and "Work Element 11" of the Statewide Water Quality Management Plan ("WQMP"), I hereby submit the following comments to the New Mexico Environment Department ("NMED") on behalf of the San Juan Water Commission ("SJWC"). I also am providing these comments to you via e-mail.

At the outset, let me state that SJWC appreciates and supports NMED's efforts to provide a comprehensive introduction to the WQMP. NMED's proposed language provides a very useful, detailed description of the federal Clean Water Act, the New Mexico Water Quality Act, and the administrative structure through which water quality issues are managed in the State. This information is invaluable to the public at large, many of whom may turn first to the WQMP to educate themselves about water quality planning and management in the State.

More specifically, SJWC is encouraged by NMED's recognition that water quality planning efforts "are evolving toward more of a watershed level focus in the context of statewide planning efforts." [Page 3] As you know, for quite some time SJWC has urged the State to focus on watershed planning, and we support the State's efforts to move in that direction, including allowing "local and regional initiatives . . . to play an increasingly important role in water quality management in New Mexico." [Page 7] SJWC hopes that these are not merely words on paper—NMED should not only permit such local initiatives to actively participate in all water quality planning and management processes, but also seriously consider information and proposals made by such initiatives. SJWC will take NMED at its word and looks forward to working with NMED in San Juan Basin watershed planning and management activities: "[A]n important aspect of the increasing trend toward a watershed protection approach is assuring a full opportunity for 'stakeholder' input into and participation in watershed planning and management activities." [Page 8]

Ms. Stephanie Stringer

February 28, 2003

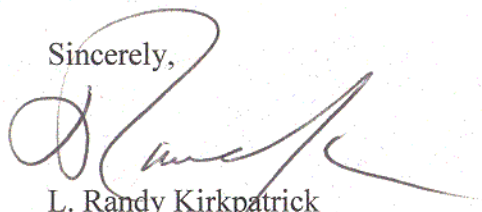
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SJWC's final comment on NMED's proposed revisions to the WQMP Introduction concerns the statement that EPA "is moving forward with requirements that states integrate the 303(d) List and the 305(b) Report" and that NMED is expecting EPA implementation of a "new TMDL Rule." [Page 10] It is our understanding that, on December 27, 2002, EPA filed a notice in the *Federal Register* proposing to withdraw the new TMDL rule. [See 67 Fed. Reg. 79020] For this reason, NMED may wish to remove the paragraph referring to the new TMDL rule.

Finally, SJWC applauds NMED's proposal to actively seek public involvement in the water quality arena, as set out in draft Work Element 11. SJWC completely agrees with NMED's statement that public involvement in water quality planning and management will "produce both better decisions and greater public acceptance and support for these decisions." [Page 13] NMED's public participation proposals will aid in generating the significant public input that is necessary for informed, practical water quality planning and management decisions, as long as NMED commits to accepting and fully considering the input provided by the public. The addition of a statement in Work Element 11 indicating that NMED and other agencies responsible for water quality planning and management, as a matter of policy, will seriously consider all public input that is received would make NMED's public participation proposals even stronger, and SJWC encourages the addition of such a statement to Work Element 11.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Randy Kirkpatrick", is written over the typed name.

L. Randy Kirkpatrick
Executive Director
San Juan Water Commission